IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

PAUL VINCENT DOMINICK :

BARBARA JEAN DOMINICK : CASE NO. 1:13-bk-02346

fdba Dominick's Antiques,

Debtors

:

PAUL VINCENT DOMINICK
BARBARA JEAN DOMINICK
fdba Dominick's Antiques,
:

Movants :

v.

SETERUS, INC as the authorized subservicer for Federal National Mortgage,

Respondent/Claimant

OBJECTION TO RESPONSE TO NOTICE OF FINAL CURE

COME NOW the Debtors, by and through attorney Dorothy L. Mott, Esquire and make this Objection to Creditor's Response to Notice of Final Cure filed in the above–captioned bankruptcy proceeding, stating in support there of as follows:

- 1. The Debtors filed a Chapter 13 bankruptcy proceeding on 5/2/2013.
- 2. The Debtors successfully completed their plan and the Trustee filed a Notice of Final Cure on May 22, 2018.
- 3. On June 12, 2018 Seterus, Inc. filed a Response to the Notice of Final Cure, stating that the debtors "are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs. Creditor asserts that the total amount remaining unpaid as of the date of this response is \$3,591.79, which includes fees, charges, expenses, escrow, and costs outstanding in the amount of \$226.25.
 - 4. Seterus has filed no Notices of Post Petition Fees and Costs.

5. The Debtors assert that they have made all required mortgage payments and suspect that the alleged balance owed is the result of charges added to the loan that were not properly noticed.

6. Although Seterus has attached documentation to the Response, the document is incomprehensible to Debtors' counsel.

WHEREFORE, the Debtors hereby request that this Honorable Court enter an order

 Disallowing and dismissing the alleged arrearages claimed in the Response to Notice of Final Cure; and

2. Declaring that the Debtors are current on the mortgage; and

3. Granting such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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Movants :

v. :

SETERUS, INC as the authorized : subservicer for Federal National :

Mortgage, Respondent/Claimant

ORDER

UPON CONSIDERATION of the Objection to Response to Notice of Final Cure filed by the Debtors, it is hereby

ORDERED that the Response to Notice of Final Cure is dismissed; and it is further

ORDERED that the Debtors are current on the mortgage as of the date of their bankruptcy discharge.